

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA**

RE:)	
)	
MARK ALLEN PLOWMAN and)	CASE NO. 15-02211-lmj13
MELISSA KAY PLOWMAN,)	
)	MOTION TO AMEND PLAN POST
)	CONFIRMATION
)	
Debtors.)	

COMES NOW Debtors Mark and Melissa Plowman, by their attorney H. J. Dane, and move the Court to Amend the Chapter 13 Plan Post Confirmation and in support hereof state as follows:

1. The Debtors divorced during the pendency of this case, and Mark Plowman has assumed responsibility for the home mortgage and the Chapter 13 plan payment.
2. Mark's outside income has declined in recent months and Mark is unable to continue to pay the house payment and the plan payment; and therefore moves to amend his plan to allow him to retain his 2019 state and federal tax refunds, to provide a payment moratorium until December 1, 2020, to reduce his payment to \$100 per week beginning December 1, 2020, and to extend his plan for twelve months – from December 1, 2020 to November 30, 2021. Melissa Plowman has consented to these terms.
3. This amendment allows the Debtors to remain in Chapter 13 and will therefore benefit the Creditors.

WHEREFORE, the Debtors pray that the Court grant their Motion to Amend Plan Post Confirmation on the terms set forth herein.

MARK ALLEN PLOWMAN and
MELISSA KAY PLOWMAN, Debtors

By /s/ H. J. Dane
H. J. Dane, Attorney for Debtors
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PROOF OF SERVICE

The undersigned certifies that the attached Instrument was served on all parties to the above cause to each of the attorneys of record herein at their respective addresses electronically (ECF) as indicated and by U.S. Mail on June 19, 2020.

By: X U.S. Mail Fax
 Hand Delivered Overnight Courier
 Certified Mail X Other Electronic, as indicated

/s/ Jeanne Hammer

Carol Dunbar, Chapter 13 Trustee mcdunbar@cfu.net	U.S. Trustee@ USTPRegion12.DM.ECF@usdoj.gov	Deanna R. Bachman on behalf of Trustee Carol Dunbar cfdubar@cfu.net
Capital One Bank PO Box 71083 Charlotte, NC 28272-1083	Department of the Treasury Internal Revenue Service P.O. Box 9002 Holtsville, NY 11742	ENT Medical Services 2615 Northgate Dr. Iowa City, IA 52245-9565
H&R Accounts, Inc. 5320 22 nd Avenue Moline, IL 61265	Internal Revenue Service Insolvency Group 210 Walnut Street, Stop 5301 Des Moines, IA 50309	Jenelle C. Arnold Aldridge PITE, LLP 4375 Jutland Drive, Suite 200 PO Box 17933 San Diego, CA 92177
Muscatine Adjustment Bureau PO Box 180 Oskaloosa, IA 52577	Ocwen Loan Servicing 1661 Worthington Rd, Suite 100 West Palm Beach, FL 33409-6493	Wilmington Trust Company c/o Ocwen Loan Servicing, LLC PO Box 24605 West Palm Beach, FL 33416-4605
Iowa Department of Revenue Attn: Bankruptcy Unit PO Box 10471 Des Moines, IA 50306	Nationstar Mortgage LLC dba Mr. Cooper PO Box 619096 Dallas, TX 75261	Midland Credit Management, Inc. PO Box 2011 Warren, MI 48090-2011